

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Mariann Kaczmarek	:	Bankruptcy No.: 20-21993-CMB
a/k/a Mariann D. Kaczmarek	:	Chapter 13
f/k/a Mariann D'Amico,	:	
Debtor.	:	Related to Document No.: 36
	:	
Mariann Kaczmarek	:	Hearing: May 11, 2021
a/k/a Mariann D. Kaczmarek	:	at 1:30 PM
f/k/a Mariann D'Amico,	:	
Movant,	:	
	:	
v.	:	
	:	
No Respondent.	:	

RESPONSE TO RULE TO SHOW CAUSE

AND NOW, comes Counsel for the debtor, Mariann Kaczmarek, and files the within Response to Rule to Show Cause, stating as follows:

1. On October 29, 2020, Debtor's Counsel filed an Omnibus Declaration of Plan Sufficiency for Mortgage Payment Change Regarding Claim No. 4, at docket no. 32, pursuant to W.PA.LBR 3002-4(d).
2. The Omnibus Declaration was filed as the mortgage held by PNC Bank, claim no. 4, is subject to payment changes occurring more than twice per year. Specifically, the payment changes related to claim no. 4 occur monthly.

WHEREFORE, the undersigned Counsel so reports.

Respectfully submitted,
The Debt Doctors, LLC

Dated: April 9, 2021

/s/ Matthew M. Herron
Matthew M. Herron, Esq.
PA I.D. No.: 88927
607 College Street, Suite 101
Pittsburgh, PA 15232
412-395-6001
mmh@thedebtctors.com